

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR'S/G&G STEAM SERVICE,	§	CASE NO. 18-20210-RLJ-7
INC.,	§	
	§	
Debtor.	§	

KENT RIES, TRUSTEE,	§	
	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 20-2003
	§	
GALMOR FAMILY LIMITED	§	
PARTNERSHIP and GALMOR	§	
MANAGEMENT, L.L.C.,	§	
	§	
Defendants.	§	

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S TRIAL EXHIBITS

TO THE HONORABLE ROBERT JONES, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Leslie Pritchard ("Pritchard"), court-appointed liquidator for Galmor Family Limited Partnership (the "FLP") and Galmor Management, L.L.C. ("GM", with the FLP, the "Defendants"), the defendants in the above styled and numbered Adversary Proceeding, and files this *Objection* to the *Trustee's Trial Witness and Exhibit List* [docket no. 62] (the "List"), filed by Kent Ries, Trustee (the "Trustee"), the plaintiff herein, respectfully stating as follows:

The Defendants hereby objects to the following exhibits identified by the Trustee in the List:

Exhibit	Objection(s)
1	Hearsay if offered to prove the existence of a debt by the FLP.
2	Hearsay if offered to prove the existence of a debt by the FLP.
3	Hearsay if offered to prove the existence of a debt by the FLP.
200	Hearsay; authentication; summary without detail provided.
201	Hearsay; authentication.
300	Trustee has not produced this document or exchanged it with the Defendants, and the Defendants do not otherwise have it so as to specifically object.
301	Hearsay.
302	Hearsay.
303	Hearsay.
304	Hearsay.
305	Hearsay.
306	Hearsay.
307	Hearsay.
308	Hearsay.
309	Hearsay.
310	Hearsay.
311	Hearsay.
312	Hearsay.
313	Hearsay.
314	Hearsay.
315	Hearsay.
503	Trustee has not produced this document or exchanged it with the Defendants, and the Defendants do not otherwise have it so as to specifically object. Of course, the Defendants have no objection to their own discovery responses, once they see that what the Trustee has offered is authentic and complete.
600	Hearsay.
601	Hearsay.
603	Trustee has not produced this document or exchanged it with the Defendants, and the Defendants do not otherwise have it so as to specifically object.

The Defendants reserve all right to object to relevance, as provided for in the Court's Scheduling Order.

Finally, with respect to the Trustee's exhibits identified in the List and not referenced above, the Trustee has not exchanged them yet with the Defendants as required by the Court's Scheduling Order. The Trustee has provided an index of many of those exhibits as having been produced by Pritchard, but the index lists only the first Bates-page and not the last, such that the Defendants are unable to definitively determine where the exhibit begins and ends. The

Defendants therefore reserve all rights to object to any of such exhibits once they see the copies tendered by the Trustee, in the event that those copies do not correspond with the Trustee's index or are otherwise not true, correct, and full copies of what Pritchard produced.

RESPECTFULLY SUBMITTED this 9th day of February, 2022.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Davor Rukavina

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**ATTORNEYS FOR LESLIE
PRITCHARD**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 9th day of February, 2022, true and correct copies of this document were served upon Kent Ries, Esq. via e-mail.

By: /s/ Davor Rukavina

Davor Rukavina, Esq.